

EXHIBIT A

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

Carlotta Taylor v. Chris L. Smith, Executive Transportation, Inc.

Case Number	15D02-2006-CT-000016
Court	Dearborn Superior Court 2
Type	CT - Civil Tort
Filed	06/01/2020
Status	06/01/2020 , Pending (active)

Parties to the Case

Defendant Smith, Chris L.

Address	224 E. 3rd Street Silver Grove, KY 41085
Attorney	Erin A Clancy <i>#2196249, Lead, Retained</i> KIGHTLINGER & GRAY LLP One Indiana Square - Suite 300 211 North Pennsylvania Street Indianapolis, IN 46204 317-638-4521(W)
Attorney	Chase Montgomery Parker <i>#3533171, Retained</i> Kightlinger & Grey, LLC One Indiana Square, Suite 300 211 N. Pennsylvania St Indianapolis, IN 46204 317-638-4521(W)

Defendant Executive Transportation, Inc.

Address	Tamara Bravo 1810 Monmouth Street Newport, KY 41071
Attorney	Erin A Clancy <i>#2196249, Lead, Retained</i> KIGHTLINGER & GRAY LLP One Indiana Square - Suite 300 211 North Pennsylvania Street Indianapolis, IN 46204 317-638-4521(W)
Attorney	Chase Montgomery Parker <i>#3533171, Retained</i> Kightlinger & Grey, LLC One Indiana Square, Suite 300 211 N. Pennsylvania St Indianapolis, IN 46204 317-638-4521(W)

Plaintiff Taylor, Carlotta

Attorney John Lewis Smith
#2692131, Retained

Morgan & Morgan
611 East Spring Street
New Albany, IN 47150
812-542-0048(W)

Chronological Case Summary

06/01/2020 **Case Opened as a New Filing**

06/01/2020 **Complaint/Equivalent Pleading Filed**

Complaint

Filed By: Taylor, Carlotta
File Stamp: 06/01/2020

06/01/2020 **Appearance Filed**

Appearance

For Party: Taylor, Carlotta
File Stamp: 06/01/2020

06/01/2020 **Subpoena/Summons Filed**

Summons for Chris Smith

Filed By: Taylor, Carlotta
File Stamp: 06/01/2020

06/01/2020 **Subpoena/Summons Filed**

Summons for Executive Transportation

Filed By: Taylor, Carlotta
File Stamp: 06/01/2020

06/08/2020 **Appearance Filed**

Appearance of Erin Clancy and Chase Parker

For Party: Smith, Chris L.
For Party: Executive Transportation, Inc.
File Stamp: 06/08/2020

06/08/2020 **Motion Filed**

Motion for Extension of Time

Filed By: Smith, Chris L.
Filed By: Executive Transportation, Inc.
File Stamp: 06/08/2020

06/09/2020 **Order Granting Motion for Enlargement of Time**

Judicial Officer: Tandy, Jack A - SR
Order Signed: 06/09/2020

06/10/2020 **Automated ENotice Issued to Parties**

Order Granting Motion for Enlargement of Time ---- 6/9/2020 : Chase Montgomery Parker;Erin A Clancy;John Lewis Smith

Financial Information

* Financial Balances reflected are current representations of transactions processed by the Clerk's Office. Please note that any balance due does not reflect interest that has accrued – if applicable – since the last payment. For questions/concerns regarding balances shown, please contact the Clerk's Office.

Taylor, Carlotta

Plaintiff

Balance Due (as of 06/29/2020)

0.00

Charge Summary

Description	Amount	Credit	Payment
Court Costs and Filing Fees	157.00	0.00	157.00

Transaction Summary

Date	Description	Amount
06/01/2020	Transaction Assessment	157.00
06/01/2020	Electronic Payment	(157.00)

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

IN THE DEARBORN CIRCUIT COURT
STATE OF INDIANA

CARLOTTA TAYLOR
Plaintiff

CASE NO. _____

CHRIS L. SMITH

and

EXECUTIVE TRANSPORTATION, INC.
Defendants

APPEARANCE BY ATTORNEY IN CIVIL CASE

This Appearance Form must be filed on behalf of every party in a civil case.

1. The party on whose behalf this form is being filed is:
Initiating Responding _____ Intervening _____; and

the undersigned attorney and all attorneys listed on this form now appear in this case for the following parties:

Name of party Carlotta Taylor, Plaintiff

Address of party (see Question # 6 below if this case involves a protection from abuse order, a workplace violence restraining order, or a no-contact order)

Telephone # of party _____

FAX: _____

Email Address: _____

(List on a continuation page additional parties this attorney represents in this case.)

2. Attorney information for service as required by Trial Rule 5(B)(2)

Name: John L. Smith Atty Number: #26921-31

Address: Morgan & Morgan, 611 East Spring Street, New Albany, IN 47150

Phone: (812) 850-6850

FAX: (812) 941-4026

Email Address: johnsmith@forthepeople.com

(List on continuation page additional attorneys appearing for above party)

3. This is a CT case type as defined in administrative Rule 8(B)(3).

4. I will accept service from other parties by:

FAX at the above noted number: Yes _____ No X

Email at the above noted number: Yes _____ No X

5. This case involves child support issues. Yes _____ No X (*If yes, supply social security numbers for all family members on a separately attached document filed as confidential information on light green paper. Use Form TCM-TR3.1-4.*)

6. This case involves a protection from abuse order, a workplace violence restraining order, or a no – contact order. Yes _____ No X (*If Yes, the initiating party must provide an address for the purpose of legal service but that address should not be one that exposes the whereabouts of a petitioner.*) The party shall use the following address for purposes of legal service:

_____ Attorney's address

_____ The Attorney General Confidentiality program address

address is (contact the Attorney General at 1-800-321-1907 or e-mail

confidential@atg.in.gov).

_____ Another address (provide)

7. This case involves a petition for involuntary commitment. Yes _____ No X

8. If Yes above, provide the following regarding the individual subject to the petition for involuntary commitment:

a. Name of the individual subject to the petition for involuntary commitment if it is not already provided in #1 above:

b. State of Residence of person subject to petition: _____

c. At least one of the following pieces of identifying information:

- (i) Date of Birth _____
- (ii) Driver's License Number _____
State where issued _____ Expiration date _____
- (iii) State ID number _____
State where issued _____ Expiration date _____
- (iv) FBI number _____
- (v) Indiana Department of Corrections Number

- (vi) Social Security Number is available and is being provided in an attached confidential document Yes ____ No ____

9. There are related cases: Yes ____ No X (*If yes, list on continuation page.*)

10. Additional information required by local rule:

11. There are other party members: Yes ____ No X (*If yes, list on continuation page.*)

12. This form has been served on all other parties and Certificate of Service is attached:

Yes ____ No X

s/ John L. Smith
John L. Smith 26921-31
Morgan & Morgan
611 East Spring Street
New Albany, IN 47150
812-850-6850 (t)
812-941-4026 (f)
johnsmith@forthepeople.com
Counsel for Plaintiff

**IN THE DEARBORN CIRCUIT COURT
STATE OF INDIANA**

CARLOTTA TAYLOR
Plaintiff

v.

CASE NO. _____

CHRIS L. SMITH

and

EXECUTIVE TRANSPORTATION, INC.
Defendants

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Carlotta Taylor, by counsel, and for her cause of action against the Defendants Chris L. Smith and Executive Transportation, Inc., states as follows:

1. At all relevant times, Plaintiff was a resident of Hamilton, Ohio.
2. At all relevant times, Defendant Chris L. Smith was a resident of Silver Grove, Commonwealth of Kentucky.
3. At all relevant times, the Defendant, Executive Transportation, Inc. was a Kentucky Corporation authorized to do business and is doing business in the State of Indiana and employed Defendant Chris L. Smith.
4. The events described in this Complaint occurred in Dearborn County, Indiana and this Court has proper venue in this action.

COUNT I

5. On or about April 8, 2019, Carlotta Taylor was operating her motor vehicle on I-275 North in Dearborn County, Indiana, when Defendant Chris L. Smith negligently and carelessly operated his motor vehicle and caused a serious collision with Plaintiff's

vehicle.

6. As a direct and proximate result of the negligence of Defendant, Plaintiff sustained serious bodily injury.

7. As a direct and proximate result of the bodily injury sustained, Plaintiff has incurred and will continue to incur medical bills and expenses, and has experienced and will continue to experience physical and mental pain, suffering, inconvenience, and lost wages.

COUNT II

8. On or about the aforementioned dated, the Defendant, Executive Transportation, Inc. was the owner of the vehicle driven by Defendant Chris L. Smith that was involved in the subject collision.

9. At all times relevant, Defendant Chris L. Smith was employed by, and acting within the scope of his employment as an employee for Defendant Executive Transportation, Inc. or one of its agents, subsidiaries, distributorships, or owned businesses or companies, or corporations, and thereby causing the aforementioned Defendant Executive Transportation, Inc. to be either directly or vicariously liable for the injuries caused to Plaintiff.

10. As a direct and proximate result of the acts and conduct of Defendant, Executive Transportation, Inc., the Plaintiff sustained severe and permanent bodily injury; has incurred and will continue to incur medical bills and expenses; and has suffered and will continue to suffer physical pain and inconvenience; all damages in excess of the minimal amount necessary to confer jurisdiction upon this Court.

11. The negligence of Defendant Executive Transportation, Inc. or one of its

employees acting within the scope of their employment, agents, subsidiaries, owned business, companies or corporations in their driving operations and/or their acts and/or omissions being otherwise negligent are the direct and proximate cause of all damages suffered by Plaintiff, or are substantial cause in causing the same.

WHEREFORE, Plaintiff, Carlotta Taylor, demands relief against Defendants Chris L. Smith and Executive Transportation, Inc. as follows:

1. Judgment against the Defendants for compensatory damages in an amount in excess of the amount necessary to invoke the jurisdiction of this court and reasonably calculated to compensate Plaintiff for her damages, to include the following:
 - a. Past and future medical expenses;
 - b. Past and future physical and mental pain and suffering, to include inconvenience;
 - c. Lost Wages.
2. Costs herein expended;
3. **Trial by jury;**
4. Any and all interest to which the Plaintiff may be adjudicated to be entitled to from the date of filing this action; until paid; and
5. Any and all other appropriate relief to which the Plaintiff may appear to be justly entitled.

Respectfully submitted,

/s/ John L. Smith

John L. Smith #26921-31
Morgan & Morgan
611 E. Spring Street
New Albany, IN 47150
812.850.6850 (t)
812.941.4026 (f)
Counsel for Plaintiff

Comes now Plaintiff, Carlotta Taylor, and demands a trial by jury on all issues so triable.

/s/ John L. Smith

John L. Smith #26921-31

IN THE DEARBORN CIRCUIT COURT
STATE OF INDIANA

CARLOTTA TAYLOR
Plaintiff

CASE NO. _____

CHRIS L. SMITH

and

EXECUTIVE TRANSPORTATION, INC.
Defendants

SUMMONS

THE STATE OF INDIANA TO: Executive Transportation, Inc.
Tamara Bravo
1810 Monmouth Street
Newport, KY 41071

You have been sued by the Plaintiff in the Court stated above.

The nature of the suit against you is stated in the complaint, which is attached to this summons. It also states the demand, which the Plaintiff has made against you.

You or your attorney must answer the petition in writing and your written answer must be filed with the Court within twenty (20) days after you receive this summons or within twenty-three (23) days if you received this summons by mail, or a judgment will be entered against you for what the Plaintiff has demanded in the attached petition.

If you deny the demand, or if you have a claim against the Plaintiff, you must assert it in your written answer.

It is suggested that you immediately consult an attorney of your choice regarding this matter.

The following manner of service of summons is hereby designated:

CERTIFIED MAIL

Dated: JUNE 1, 2020


CLERK, DEARBORN COUNTY



IN THE DEARBORN CIRCUIT COURT
STATE OF INDIANA

CARLOTTA TAYLOR
Plaintiff

CASE NO. _____

CHRIS L. SMITH

and

EXECUTIVE TRANSPORTATION, INC.
Defendants

SUMMONS

THE STATE OF INDIANA TO: Chris L. Smith
224 E. 3rd Street
Silver Grove, KY 41085

You have been sued by the Plaintiff in the Court stated above.

The nature of the suit against you is stated in the complaint, which is attached to this summons. It also states the demand, which the Plaintiff has made against you.

You or your attorney must answer the petition in writing and your written answer must be filed with the Court within twenty (20) days after you receive this summons or within twenty-three (23) days if you received this summons by mail, or a judgment will be entered against you for what the Plaintiff has demanded in the attached petition.

If you deny the demand, or if you have a claim against the Plaintiff, you must assert it in your written answer.

It is suggested that you immediately consult an attorney of your choice regarding this matter.

The following manner of service of summons is hereby designated:

CERTIFIED MAIL

Dated: JUNE1, 2020

CLERK, DEARBORN COUNTY

Gayle L. Remington



**APPEARANCE FORM (CIVIL)
RESPONDING PARTY**

1. Please enter my appearance for:

CHRIS L. SMITH AND EXECUTIVE TRANSPORTATION, INC.

2. Attorney information (as applicable for service of process):

3. Will responding party accept FAX service: Yes No X

4. Additional information required by state or local rule:

KIGHTLINGER & GRAY, LLP

By: /s/Erin A. Clancy
Erin A. Clancy, I.D. No. 21962-49
Chase M. Parker, I.D. No. 35331-71
*Attorney for Defendants, Chris L. Smith and
Executive Transportation, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2020, the foregoing was electronically filed with the Dearborn County Circuit Court and was served – through the Court’s E-Filing system – on the following:

John L. Smith
Morgan & Morgan
611 E. Spring Street
New Albany, IN 47150
Johnsmith@forthepeople.com
Counsel for Plaintiff

/s/Erin A. Clancy
Erin A. Clancy

KIGHTLINGER & GRAY, LLP
One Indiana Square, Suite 300
211 N. Pennsylvania Street
Indianapolis, IN 46204
(317) 638-4521
Eclancy@k-glaw.com

STATE OF INDIANA) IN THE DEARBORN COUNTY CIRCUIT COURT
)) SS:
COUNTY OF DEARBORN) CAUSE NO. 15D02-2006-CT-000016

CARLOTTA TAYLOR,)
)
Plaintiff,)
)
vs.)
)
CHRIS L. SMITH AND)
EXECUTIVE TRANSPORTATION, INC.,)
)
Defendants.)

DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT

Defendants Chris L. Smith and Executive Transportation, Inc. ("Defendants"), by counsel, respectfully moves the Court for an extension of time of 30 days up to and including July 24, 2020, in which to file a responsive pleading to Plaintiff's Complaint. In support of said Motion, Defendants show the Court:

1. That Plaintiff's Complaint was filed with the Court on June 1, 2020; thereby making Defendants' response due no earlier than June 24, 2020.
2. Defendants respectfully request an initial enlargement of time of thirty (30) days or to and including July 24, 2020, within which to answer or otherwise respond to Plaintiff's Complaint.
3. This request for an enlargement of time is not made for the purposes of delay, but rather to allow time for Defendants' counsel to prepare a proper response to Plaintiff's Complaint.
4. Counsel for Defendants contacted counsel for Plaintiff who has no objection to the filing of this Motion.

WHEREFORE, Defendants Chris L. Smith and Executive Transportation, Inc., pray that the time for filing a responsive pleading to the Plaintiff's Complaint be extended for a period of thirty (30) days, up to and including July 24, 2020.

KIGHTLINGER & GRAY, LLP

By: /s/Erin A. Clancy
Erin A. Clancy, I.D. No. 21962-49
Chase M. Parker, I.D. No. 35331-71
*Attorney for Defendants, Chris L. Smith and
Executive Transportation, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2020, the foregoing was electronically filed with the Dearborn County Circuit Court and was served – through the Court's E-Filing system – on the following:

John L. Smith
Morgan & Morgan
611 E. Spring Street
New Albany, IN 47150
Johnsmith@forthepeople.com
Counsel for Plaintiff

/s/Erin A. Clancy
Erin A. Clancy

KIGHTLINGER & GRAY, LLP
One Indiana Square, Suite 300
211 N. Pennsylvania Street
Indianapolis, IN 46204
(317) 638-4521
Eclancy@k-glaw.com

ORDER ON EXTENSION OF TIME

This cause came before the Court upon the Motion of the Defendants for a Motion for Extension of Time to respond to Plaintiff's Complaint.

The Court, having considered said Motion and, being duly advised in the premises, now
GRANTS the same, and

THEREFORE, IT IS ORDERED that the Defendants Chris L. Smith and Executive Transportation, Inc., may have an extension of time of thirty (30) days, up to and including July 24, 2020, within which to answer or otherwise plead to Plaintiff's Complaint.

DATED: 6/9/2020

Judie A Tandy
Senior Judge, Dearborn County Court 2
Superior

John L. Smith Morgan & Morgan 611 E. Spring Street New Albany, IN 47150 Johnsmith@forthepeople.com <i>Attorney for Plaintiff</i>	Erin A. Clancy Chase M. Parker KIGHTLINGER & GRAY, LLP One Indiana Square, Suite 300 211 N. Pennsylvania Street Indianapolis, IN 46204 eclancy@k-glaw.com cparker@k-glaw.com <i>Attorney for Defendant</i>
---	--